

REMARKS

Claims 1-4, 9-14, 19-21 and 36-51 are all the claims pending in the application. With this amendment, Applicants add claims 52-55.

I. Information on the arguments presented in this amendment.

Applicants are submitting two sets of arguments. The arguments under Section II are applicable if the Examiner enters the claim amendments. The arguments under Section III are applicable with or without the entry of the claim amendments.

In general, Applicants submit that the present invention differs from the prior art in that the selection of printers in the present interface unit is done automatically, whereas, in the prior art, especially Endo, the selection of printers is manually determined by user input such as changing the size of the exposure area and output format.

II. Arguments if Claim Amendments are Entered

Claim Rejections - 35 U.S.C. § 102

The Examiner has rejected claims 1-2, 9 11-12, 19, 21, 36-39 and 44-51 under 35 U.S.C. § 102(e) as being anticipated by Endo et al. (US 6,335,796) ["Endo"]. For at least the following reasons, Applicants traverse the rejection.

Claim 1 recites an interfacing method comprising "selecting a network printer ... which corresponds to a kind of film coinciding with an output request sent via the network to the interface unit from a terminal connected to the network." The Examiner contends that I/F elements 13, 66 correspond to the claimed interface unit and that LAN 5, 55 corresponds to the claimed network.

Endo, at most, discloses that an operator panel of an image pick-up apparatus is connected to a control unit, which may include an I/F element (Figs. 1, 2, 14 and 15). Communications between the operator panel and control unit are performed directly. There is no disclosure or suggestion in Endo that any communications between the operator panel and the control unit (with the I/F) occur via the LAN. Therefore, Applicants submit that Endo does not disclose or even remotely suggest that “an output request [is] sent via the network to the interface unit from a terminal connected to the network” as set forth in claim 1. (emphasis added).

Because independent claim 11 recites features similar to those given above with respect claim 1, Applicants submit that claim 11 is patentable for at least reasons similar to those given above with respect to claim 1.

Applicants submit that claims 2, 9/1, 9/2, 10, 12, 19/11, 19/12, 21/11, 21/12, 36-39 and 44-51 are patentable at least by virtue of their respective dependencies.

Claim Rejections -35 U.S.C. § 103:

The Examiner has rejected claims 3-4, 13-14 and 40-42 under 35 U.S.C. § 103(a) as being unpatentable over Endo in view of Mori (US 6,070,000) [“Mori”]. For at least the following reasons, Applicants traverse the rejection.

Because independent claims 3 and 13 recite features similar to those given above with respect to claim 1 and Mori does not cure the deficient teachings of Endo with respect to claim 1, Applicants submit that claims 3 and 13 are patentable for at least reasons similar to those given above with respect claim 1.

Applicants submit that claims 4, 9/3, 9/4, 14, 19/13, 19/14, 21/13, 21/14 and 40-42 are patentable at least by virtue of their respective dependencies.

The Examiner has rejected claims 10 and 20 as being unpatentable over Endo in view of McCormack et al. (US 6,295,527) [“McCormack”]. For at least the following reason, Applicant traverses the rejection.

Because McCormack does not cure the deficient teachings of Endo or Mori with respect to independent claims 1, 3, 11 and 13, Applicants submit that these claims are patentable at least by virtue of their respective dependencies.

III. Arguments unrelated to the Entry of the Claim Amendments

Claim Rejections - 35 U.S.C. § 102:

The Examiner has rejected claims 1-2, 9 11-12, 19, 21, 36-39 and 44-51 under 35 U.S.C. § 102(e) as being anticipated by Endo et al. (US 6,335,796) [“Endo”]. For at least the following reasons, Applicants traverse the rejection.

The Examiner contends that the arguments filed on April 5, 2004, have been considered, but were not persuasive. In the Response to the Arguments, the Examiner misinterprets Applicants arguments by stating “Applicant argues that Endo does not show where the interfaces 13 and 66 is connected to Printers.” (emphasis added). Applicants, in fact, argued that Endo clearly shows that the interface units 13, 66 are not connected to the printers.

The Examiner still has not provided any disclosure rebutting Applicants argument that the printers are not connected o the interface units.

Further, claim 1 recites “an interfacing method, wherein a plurality of network printers ... are connected by an interface unit to...[a] network.” The Examiner still contends that elements 13 and 66 correspond to the claimed interface units. Even assuming, for the sake of argument alone, that elements 13 and 66 correspond to the claimed interface units, Figs. 1 and 14 clearly show that the printers are directly connected to LAN 5 and 55, respectively, and not “by an interface unit.” Thus, the printers are not connected by an interface unit to a network as set forth in claim 1.

In addition, the Examiner attempts to rebut the arguments in the April 5 filing by contending that the CPUs of Endo check the state of the printer. However, Figs. 2 and 15 clearly show that CPUs 11 and 64 are not part of the alleged interface units 13 and 66. Therefore, Endo does not disclose or suggest that an interface unit perform the method recited in claim 1.

Accordingly, Applicants incorporate the arguments as set forth in the April 5 filing in their entirety.

Because independent claim 11 recites features similar to those given above with respect to claim 1, Applicants submit that claim 11 is patentable for at least the reasons given above with respect to claim 1.

In addition, Applicants submit that the Examiner has not rebutted the argument that method steps that involve an operator do not disclose elemental steps of an apparatus claim. *See In re Bell*, 26 USPQ2d 1529 (Fed. Cir. 1993). Therefore, Applicants incorporate the argument of the April 5 filing with respect to claim 11 in its entirety.

Applicants submit that claims 2, 9/1, 9/2, 10, 12, 19/11, 19/12, 21/11, 21/12, 36-39 and 44-51 are patentable at least by virtue of their respective dependencies.

With respect to claim 2, Applicants submit that the Examiner has not rebutted the argument for patentability of claim 2 as set forth in the filing of April 5 and, therefore, Applicants incorporate the argument in its entirety.

The Examiner rejects newly added claims 44-51 by contending that Endo discloses the automatic selection of printers based on the output request. Applicants submit that the cited section by the Examiner clearly shows that the selection of available film sizes, which directly corresponds to a printer (see printers 6-8, col. 5, lines 1-30), is determined by operating switch 35, which is set manually (see col. 5, lines 46-55) and further based on a user's input exposure area. Therefore, Endo does not disclose the automatic selection of printers based on an output request as set forth in claims 44-51.

Claim Rejections -35 U.S.C. § 103:

The Examiner has rejected claims 3-4, 13-14 and 40-42 under 35 U.S.C. § 103(a) as being unpatentable over Endo in view of Mori (US 6,070,000) ["Mori"]. For at least the following reasons, Applicants traverse the rejection.

The Examiner does not rebut the arguments in the April 5 filing that one skilled in the art would not have combined the references as contended by the Examiner. Specifically, the Examiner's reasons for combining are not supported in the prior art. "The mere fact that references can be combined or modified does not render the resultant combination obvious

unless the prior art also suggests the desirability of the combination.” MPEP 2100 at 131.

Therefore, Applicants incorporate the arguments in its entirety.

Moreover, there is no particular reason why a second interface unit would need to be provided to provide the back-up printer configuration. The ability to back up is not tied to use of a second interface but a cascade of printers.

Applicants submit that claims 4, 9/3, 9/4, 14, 19/13, 19/14, 21/13, 21/14 and 40-42 are patentable at least by virtue of their respective dependencies.

In addition, with respect to claims 40-42, the Examiner concedes that Endo does not disclose that the kind of film is defined by a film base color, but applies Mori to allegedly cure the deficiency. Applicants submit that the Examiner’s cited section, at most, discloses the printing of color data, which bears no relationship to the claimed film base color. Therefore, Endo and Mori (alone or in combination) do not disclose the claimed combination.

The Examiner has rejected claims 10 and 20 as being unpatentable over Endo in view of McCormack et al. (US 6,295,527) [“McCormack”]. For at least the following reason, Applicants traverse the rejection.

Because McCormack does not cure the deficient teachings of Endo or Mori with respect to independent claims 1, 3, 11 and 13, Applicants submit that these claims are patentable at least by virtue of their respective dependencies.

IV. New Claims

With this amendment, Applicants add claims 52-55. Applicants submit that these claims are patentable at least by virtue of their respective dependencies, as well as the features set forth therein.

V. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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